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Attorney for Defendant  
JOSE MANUEL ONTIVEROS VERDUGO

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No: 2:23-CR-0162-DAD
Plaintiff,	)	
	)	
vs.	)	STIPULATION AND ORDER TO CONTINUE
	)	STATUS CONFERENCE AND EXCLUDE
JORGE OMAR ARREDONDO-GARCIA, et	)	TIME
al.,	)	
Defendant.	)	District Judge Dale A. Drozd
	)	New Date: December 17, 2024
	)	Time: 9:30 a.m.
	)	

IT IS HEREBY STIPULATED and requested by and between the parties through their respective counsel, ADRIAN KINSELLA, Assistant United States Attorney, attorney for the GOVERNMENT; PATRICK MCCARTHY, attorney for Defendant JORGE OMAR ARREDONDO-GARCIA; DINA SANTOS, attorney for Defendant GREGORIO ONTIVEROS VERDUGO; RACHELLE BARBOUR, attorney for Defendant JOSE MANUEL ONTIVEROS VERDUGO; MARK REICHEL, attorney for Defendant ALBERTO NAVARRO ZAPATA; and MICHAEL LONG, attorney for Defendant WILFREDO F. REYES, that the status conference currently set for Tuesday, September 24, 2024, be continued to Tuesday, December 17, 2024 at 9:30 a.m., and that time be excluded for preparation of counsel.

There is a protective order in this multi-defendant case. (Doc. 69.) The Government first produced discovery consisting of approximately 700 pages of Bates-stamped documents and over 73.9 gigabytes of native files, including cell phone databases and other items for defense review. The Government then produced over 1400 pages of additional protected discovery. A

third production of approximately 2000 pages and files of protected discovery was received in March. The discovery includes dozens of audio files from wiretaps and many surveillance videos.

Since the start of the case, Defense counsel have been reviewing and analyzing the above, conducting legal research, meeting with their clients, and otherwise preparing for trial. The above tasks are ongoing, and the defense requires additional time to review discovery, discuss the case with their clients and the Government, and continue to prepare. The parties believe that failure to grant the requested continuance would deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

Accordingly, the parties stipulate and request that the Court exclude time between the date of the filing of this stipulation through the new status conference date of December 17, 2024 under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4). The parties agree that the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

Date: September 18, 2024

/s/ Patrick McCarthy  
PATRICK McCARTHY  
Attorney for Defendant  
JORGE OMAR ARREDONDO-GARCIA

/s/ Dina Santos  
DINA SANTOS  
Attorneys for Defendant  
GREGORIO ONTIVEROS VERDUGO

HEATHER E. WILLIAMS  
Federal Defender

/s/ Rachelle Barbour  
RACHELLE BARBOUR  
Attorney for Defendant  
JOSE MANUEL ONTIVEROS VERDUGO

/s/ Mark Reichel  
MARK REICHEL

Attorney for Defendant  
ALBERTO NAVARRO ZAPATA

/s/ Michael Long  
MICHAEL LONG  
Attorney for Defendant  
WILFREDO F. REYES

DATED: September 18, 2024

PHILLIP A. TALBERT  
United States Attorney

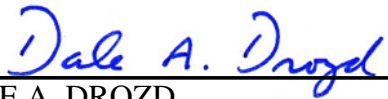
/s/ Adrian Kinsella  
ADRIAN KINSELLA  
Assistant U.S. Attorney  
Attorney for the United States

O R D E R

Pursuant to the stipulation of the parties and good cause appearing, the status conference scheduled for September 24, 2024 is continued to December 17, 2024 at 9:30 a.m. and time is excluded under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4).

IT IS SO ORDERED.

Dated: September 18, 2024

  
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DALE A. DROZD  
UNITED STATES DISTRICT JUDGE